

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) Magistrate No. 21-mj-3063 (KAR)
 v.)
)
BENJAMIN SHACAR,)
)
 Defendant.)

)

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of defendant, pursuant to 18 U.S.C. ' 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because it involves (check all that apply):

- X Felony crime of violence, sex trafficking, or terrorism offense
- Maximum sentence of life imprisonment or death
- 10 plus years drug offense
- Felony, with two prior convictions in above categories
- X Serious risk defendant will flee
- X Serious risk of obstruction of justice
- Felony involving use or possession of firearm or destructive device
- X Felony involving minor victim, possession of firearm, destructive device or dangerous

weapon, or failure to register as a sex offender

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which reasonably will assure (check all that apply):

 X Defendant=s appearance as required

 X Safety of any other person and the community

3. Rebuttable Presumption

The United States will invoke the rebuttable presumption against defendant pursuant to 18 U.S.C. ' 3142(e). If Ayes,@ the presumption applies because (check all that apply):

 Probable cause to believe defendant committed
10 plus year drug offense or firearms offense,
18 U.S.C. ' 924(c)

 Previous conviction for Aeligible@ offense
committed while on pretrial bond

 X Probable cause to believe defendant committed
an offense involving a minor victim

4. Time for Detention Hearing. The United States requests that the Court conduct the detention hearing:

 At first appearance

 X After continuance of 3 day(s) (not more than 3)

5. Witnesses. The United States intends to rely upon a

proffer by an Assistant U.S. Attorney or the testimony of witnesses. The amount of time for the government=s proffer or direct examination of witnesses is estimated to be: one-half hour.

6. Other Matters.

None. Respectfully submitted,

NATHANIEL R. MENDELL
ACTING UNITED STATES ATTORNEY

By: /s/ Alex J. Grant
Alex J. Grant
Assistant U.S. Attorney

Dated: March 24, 2021

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
March 24, 2021

This is to certify that the foregoing document, filed by email, will be emailed or handed to counsel of record.

/s/ Alex J. Grant
ALEX J. GRANT
Assistant United States Attorney